

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

SERGEJ LETYAGIN, d/b/a
SUNPORNO.COM, "ADVERT", "CASTA",
"TRIKSTER", "WORKER", "LIKIS",
"TESTER" and DOES 1-50

Defendants

Case No. 11-cv-62107-KMW

**DECLARATION OF ERIKA DILLON IN
SUPPORT OF FIRST AMENDED
COMPLAINT**

I, ERIKA DILLON, do declare under the penalty of perjury that:

1. I am over the age of 18 and am a resident of the State of Nevada.
2. I have personal knowledge of the facts herein, and if called as a witness, could testify competently thereto.
3. I am employed by Liberty Media Holdings, LLC in Las Vegas, Nevada as an in-house paralegal.
4. I performed searches of the Skype profiles publicly available and located the profile of Donald_home, who, on information and belief, is Defendant Letyagin. This Skype profile lists "Prague, Czech Republic" as its location. A true and correct copy of this profile and the search used to locate it are attached to the First Amended Complaint as Exhibit A.
5. I also ran searches on the website Compete.com, a website that records the number of unique hits to a website per day. A true and correct copy of this data for SunPorno.com is attached to the First Amended Complaint as Exhibit B.

6. I further retrieved information from Alexa.com, a website that contains traffic rankings data for various internet sites. A true and correct copy of the SunPorno.com data available is attached to the First Amended Complaint as Exhibit C.

7. I also further investigated the membership terms and conditions for premium memberships available on SunPorno.com. A true and correct copy of these terms and conditions is attached as Exhibit D. When signing up for this premium membership, a credit card is required to “verify age.” On this page, there is a link to the above-referenced terms and conditions and a box containing bonus offers. A true and correct copy of this page is attached as Exhibit E.

8. At the time of the initial complaint, Liberty had yet to receive the copyright certificate for one of the works at issue in this case, “Philip Fucks Trey.” We have now received this certificate and a true and correct copy of it is attached as Exhibit F.

Dated: November 17, 2011 in Las Vegas, NV.


Erika Dillon